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10-11-1 & 10-11-2

December 16th, 2010

Mary D. Nichols, Chairwoman
California Air Resources Board
1101 I Street – POB 2815
Sacramento, Ca 95812

RE: Support of Forest Project Protocols Proposed in AB32 Cap and Trade Regulations

Dear Chairman Nichols and Board Members,

I am submitting this letter of support for the Forest Project Protocols (FPP) in the proposed AB 32 Cap and Trade Rule. As a Registered Professional with 30 plus years as a practitioner of even and uneven age management, I support the decision to include the recognition of all Silvicultural methods to achieve carbon sequestration, reduce carbon emissions and sustain all forest resources.

The salient issue for me is retaining even-aged management as a viable Silvicultural option, specifically on damaged or cutover timberlands and particularly in our disturbance oriented fire evolved ecosystem. Whether by design or in response to Mother Nature, even-aged management meets the goals of the state and many landowners.

With recognition of environmental protection in the Forest Practice Act, Forest Practice Rules and CEQA as a base line, even age management achieves distribution of landscape habitat, forest productivity, fuel reduction, and long term sustainable forest health.

Once you get past the harvest and initial visual starkness so often portrayed as horrific, the newly planted areas begin to grow, much like kids. Each one of my three kids has their place in the forest where their age and the stand age are the same, which I have captured over time. See photos 1-4.

As an example, I completed a 17-acre harvest and planting in 1982. The previous stand was growing at only 350 bd.ft/ac./yr. After one non-commercial thinning to reduce overcrowding and maintain growth, the area was left to grow. During this 28 year period the stand has grown 567 bd.ft/ac./yr. To reduce overcrowding and maintain growth we commercially thinned. See photo 5.

The harvest produced 670 green tons of logs and 410 tons of chips for a total of 1080 tons of forest product material. That's 40 tons of logs and 24 tons of chips per acre or 64 tons of forest products removed per acre in only 28 years. The chips produced 261 bone dry tons of material that was converted to electricity in a co-generation plant.

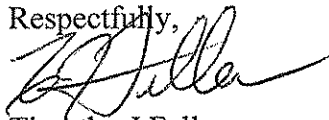
The remaining stand of fast growing timber retains 122 tons of logs and chips per acre. In just trees, including the harvest volume, a total of 186 tons/ac of biomass has been grown on every acre sequestering roughly 90 tons per acre in carbon.

The whole tree thinning harvest accomplished forest fuels reduction for increased resilience to wildfire, reduced inter tree competition, increasing the overall health, vigor and growth of the stand and provided forest products including biomass for cleaner electricity.

Incentives to increase overall forest health, promote reduced fuel emissions and keep California's forests as forests sequestering carbon are goals identified in AB 32 and the FPP. Even-aged management is a vital tool that helps forest landowners meet these goals.

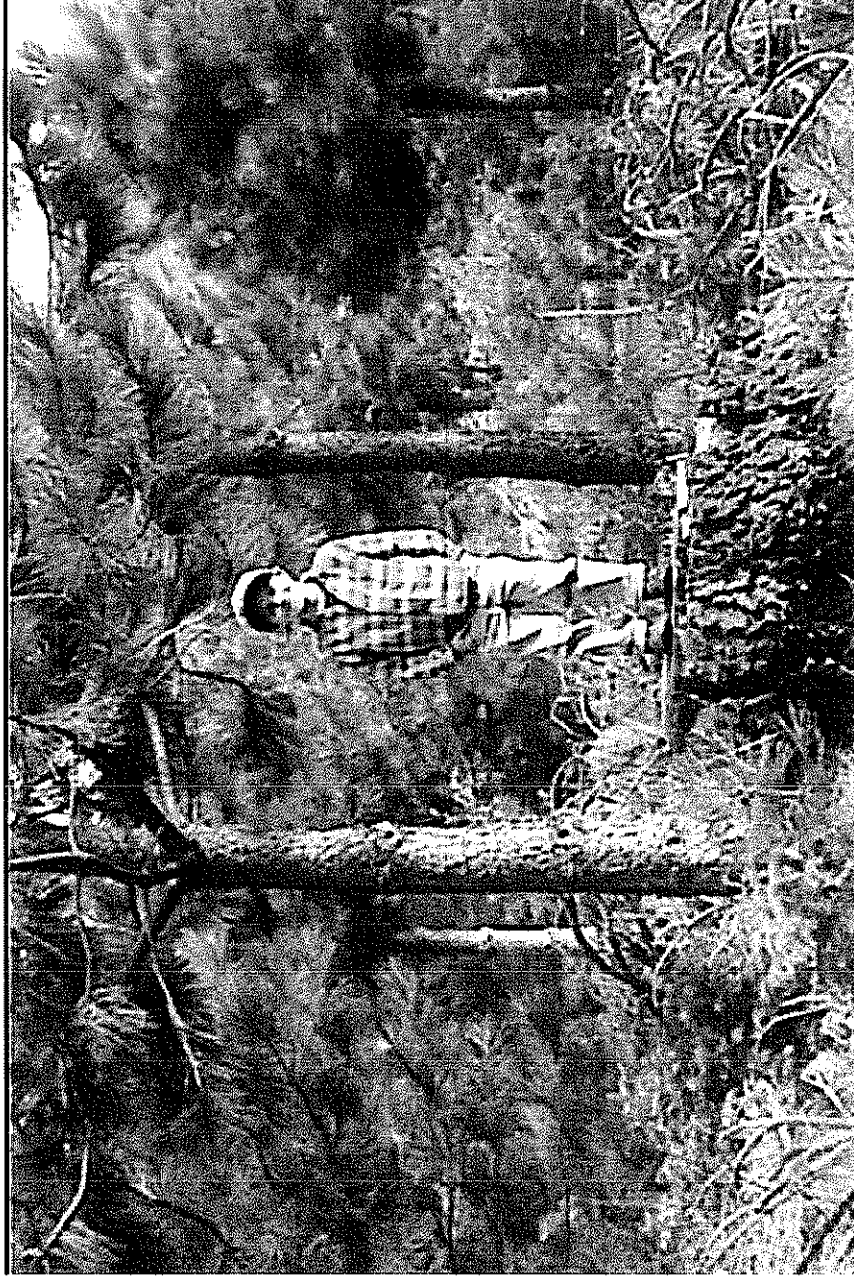
I applaud you and your staff for their efforts over the past few years to make California a leader in recognizing the contribution our forests can make to the forest carbon protocols and reduction of greenhouse gas emissions.

Respectfully,

A handwritten signature in black ink, appearing to read 'T. J. Feller', written over the word 'Respectfully,'.

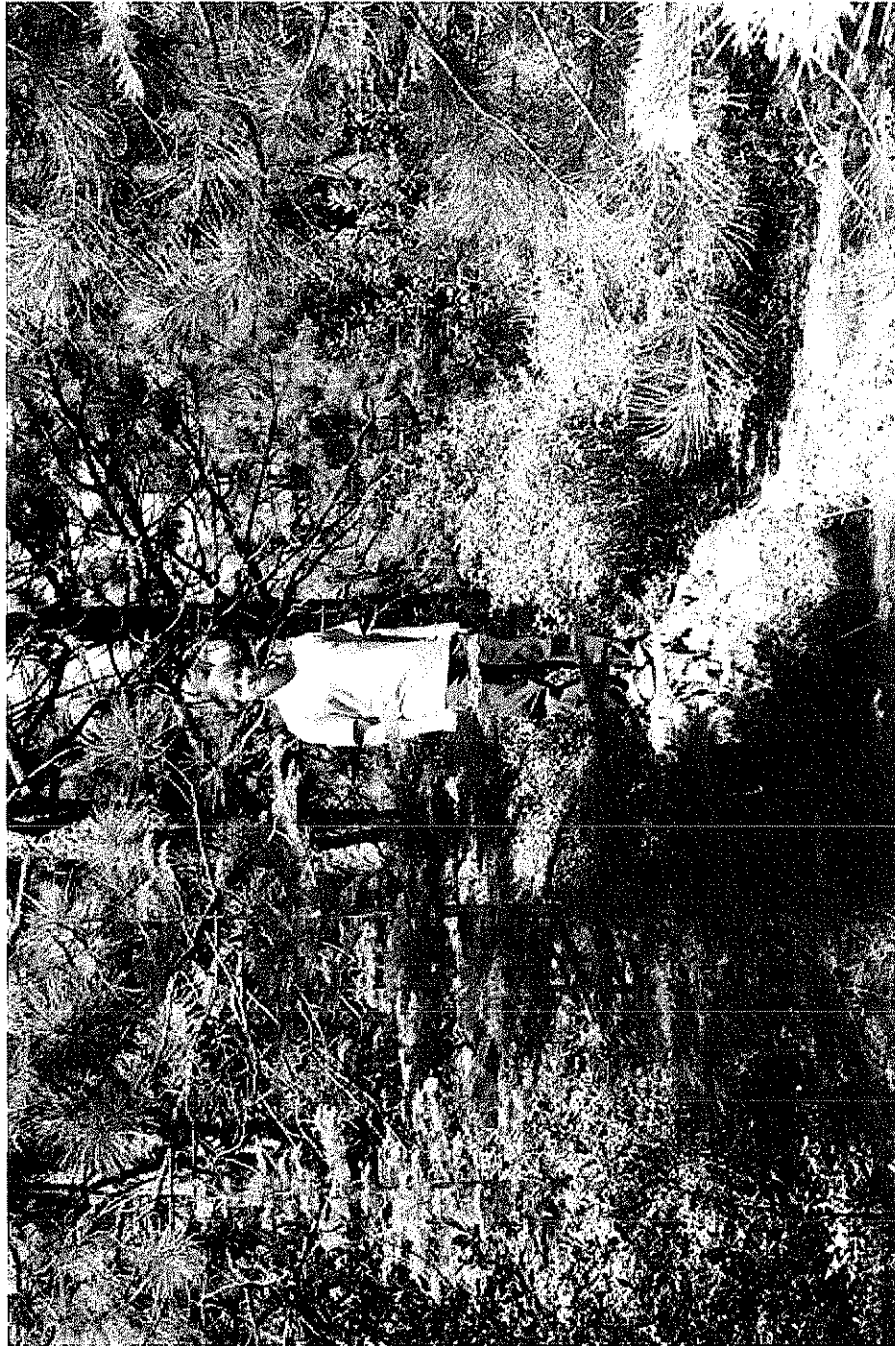
Timothy J. Feller

Registered Professional Forester # 1931



Age 10 1999

Photo 1



Age 20 2009

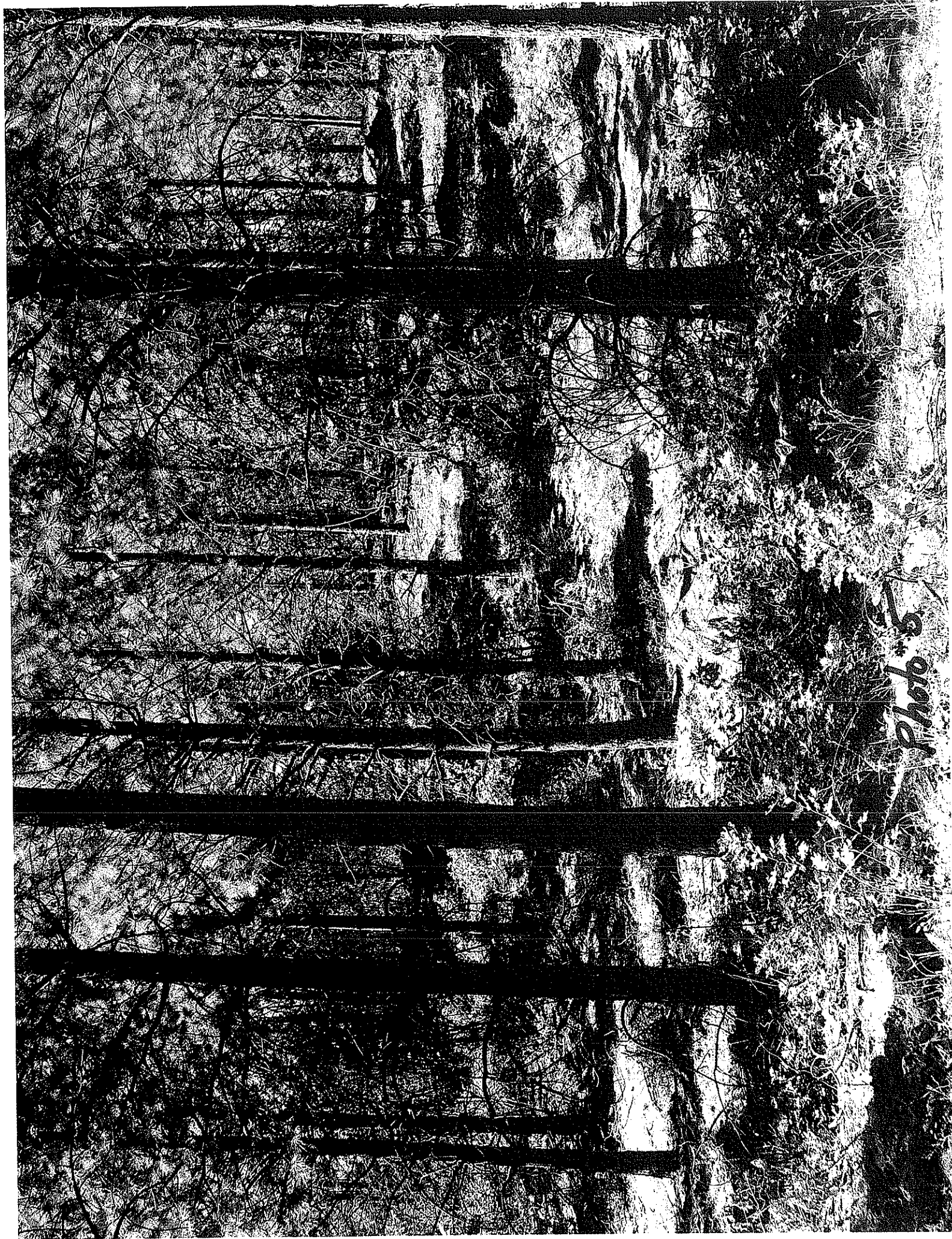
Photo 2



Photo 3



photo 4



Phot 5